

EXHIBIT F

Jennifer Johnson

From: shawn@manganolaw.com
Sent: Friday, January 21, 2011 4:01 PM
To: Jennifer Johnson
Cc: Laurence Pulgram; 'Kurt Opsahl'
Subject: RE: Righthaven LLC v. Democratic Underground

Jennifer:

I know the first part of next week is really tight with other client matters aside from the Righthaven-related actions. I will get back to you with some available times for a meet and confer on the RFA responses.

With regard to the interrogatory and request for production responses, Righthaven was handling their service. If they did not go out electronically, then they may have only gone out via U.S. Mail. I know they were prepared by me and provided to Righthaven to print out and serve.

Regards,

S

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----- Original Message -----

Subject: Righthaven LLC v. Democratic Underground
From: "Jennifer Johnson" <jjjohnson@fenwick.com>
Date: Fri, January 21, 2011 2:50 pm
To: <shawn@manganolaw.com>
Cc: "Laurence Pulgram" <LPulgram@Fenwick.com>, "'Kurt Opsahl'" <kurt@eff.org>

Dear Shawn,

We are in receipt of Righthaven's responses to DU's First Set of Requests for Admission, and we would like to set up a time to meet and confer regarding the inadequacy of Righthaven's responses. We note at the outset that Righthaven provided only objections and no response to 78 of the 82 Requests for Admission. We would like to confer no later than January 26, so please provide your availability.

Additionally, we would like to receive by January 26: (1) the documents responsive to DU's First Set of Requests for Production of Documents and (2) responses to DU's First Set of Interrogatories. Righthaven has waived all objections to these discovery requests by not timely responding in any fashion. If

you are not prepared to provide that information by January 26, we should include this subject in our meet and confer session as well.

Please notify us as to when you are available to meet and confer.

Regards,
Jennifer



JENNIFER J. JOHNSON

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